

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

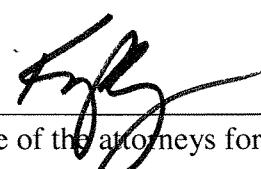
In re: ) Chapter 11  
 )  
W.R. GRACE & CO., et al. ) Case No. 01-01139 (JKF)  
 )  
Debtors ) (Jointly Administered)  
 )  
 ) Hearing Date December 18, 2006 2:00 P.M.

**NOTICE OF WITHDRAWAL OF OBJECTION OF COONEY & CONWAY TO  
NOTIFICATION THAT THE DEBTOR IS CONTESTING CERTAIN PRE-PETITION  
SETTLED CLAIMS**

1. On October 12, 2006 claimants represented by Cooney & Conway submitted their proof of claim forms and supporting evidence to the Debtor's agent, Rust Consulting, pursuant to the Court's August 24, 2006 Order (Docket No. 13061). All 191 had pre-petition settlements with Debtor.
2. On November 8, 2006 Debtor's counsel notified claimants' counsel by letter that there were discrepancies between the Debtor's records on settled claims and Cooney and Conway's. The Debtor stated that "Debtors' records do not correspond with the settlements described in the proof of claims forms and supporting materials that Cooney & Conway submitted for the claimants listed above, the Debtor dispute and contest the settlements of these claimants."
3. On November 21, 2006 these claimants filed "Claimants' Objection and Response to W.R. Grace's Attempt to Dispute and Contest Settled Pre-Petition Asbestos PI Claims" regarding the status of unsettled claims.

4. On December 1, 2006, Debtor filed its "Brief Regarding Settled Pre-Petition Asbestos PI Claims." Debtor stated that for present purposes, however, "Grace agrees that none of the 474 claimants for whom Cooney & Conway submitted proofs of claim for purportedly Settled Pre-Petition Asbestos PI Claims need to submit Questionnaires." (Page 9 & 10).
5. Based upon the representation in the Debtor's brief that the Debtor is not challenging the Cooney & Conway claims at the present time, Cooney & Conway agrees that the Objection filed is moot in all respects. Accordingly, Cooney & Conway withdraws its Objection.

Respectfully Submitted,  
Cooney & Conway

  
One of the attorneys for the Claimants

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